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Cc:	MCCLINCY Matt; POULSEN Mike
Subject:	Path Forward on RD2 Rpt
Date:	04/18/2007 01:30 PM

Eric & Chip,
The purpose of this e-mail is to give you my perspective on moving forward, & to try to support you on the tough decisions you're facing. The intent of this e-mail is to help..., not to confound your efforts.

Givens

Here are the **givens** I have on the project:

1) We're only going to be able to cleanup sediment…, & control sources (GW, bank erosion, etc) affecting sediment, surface water, & biota. We're not able to cleanup fish & surface water thru CERCLA.

2) The nature & extent of sediment contamination in PH is nearly adequately characterized…, & few sediment characterization data gaps exist. Additional sediment characterization will be needed in the RD/RA.

3) EPA/LWG have not agreed upon how to assess risk in the project. We're nearly at agreement for HH, but are still unclear on eco risk.

Major Tasks

Here are the **major tasks** facing us:

1) Identifying project data gaps & SOW needed to support the completion of the RI/BRAs…, & to be filled in RD3B by early-'08.

2) Directing the LWG on how to complete the RI/BRAs.

Suggested Path Forward

Complete the SLRA, identify data gaps, provide direction to LWG on RI/BRAs:

-Step 1- Finalize the SLRA (or at least the major, anticipated, risk-driving pathway/receptor/SLs). This can be done as a collaborative effort with the LWG or done by EPA/partners alone.

-Step 2- Use the COPCs & SLs that come out of the SLRA & then use iso-concentrations or iso-risk maps to identify iAOPCs. These iAOPCs may be defined by exceedance of SLs or exceedance of multiples of SLs (this is a lot like EPA did in fall '05…, only much more formally & accurately). Identify RD3B data gaps needed to better define the iAOPCs.

-Step 3- Develop a list & define important RD3B data gaps needed to support the FWM/BSAFs, loading evaluation, biota evaluations, etc. This will be the tough one to reach agreement on & complete.

-Step 4- Develop directions to LWG for their completion of the RI/BRAs.

The biggest concern I have with this suggested path forward is that we get hung-up in finalizing Step 1 &/or Step 3…, & blow the schedule. An alternative to my suggested path forward is not to finalize the SLRA & just use the work the LWG presented in the RD2 report. If we did this, it would potentially keep the schedule moving forward, but…, because of our discomfort with the RD2 report…, we'd need to take conservative stances on developing data gaps. Furthermore, without agreeing on the SLRA, we may get hung-up on defining data gaps.

List of Maps List of Topics

During today's call, you said you would develop a **list of maps** EPA would like to see & a **list of topics** that need to be resolved. Here's my input into those 2 lists:

Maps- LWG (or PMX?) should prepare sediment iso-concentrations maps for the major risk-driving COIs (total PCBs, metals, LPAHs/HPAHs, phthalates, TPH, DDx). Ideally the iso-concentrations would be tied to SLs & multiples of SLs.

Topics to be resolved- in addition to some of the topics you mentioned this morning (FWM, benthic predictive model, PAHs, TPH, etc) I suggest you consider this comment I sent you earlier. The RD 2 SLRA & development of iAOPCs were based on COI-by-COI comparison to iPRGs or other methods (e.g., bioassays). However, SLRAs should consider 3 comparisons:

-Individual- COI-by-COI. This is the concept of hazard quotients (HQs).

-Cumulative multiple COIs in 1 given medium (additive). This is the concept of hazard indexes (HIs).

-Aggregate- simultaneous exposure to individual or multiple COIs within different media (e.g. HIs summed from sediment HQ & TZW HQ).

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